

APR 0 4 2014

IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TEXAS EL PASO DIVISION

WESTERN DISTRICT OF TEXAS
BY DEPUTY

UNITED STATES OF AMERICA,

Plaintiff,

V.

No. EP-14- M - \\
S No. EP-14- M - \\
Defendant.

GOVERNMENT'S MOTION TO DETAIN DEFENDANT WITHOUT BOND AND MOTION FOR CONTINUANCE

Comes now the United States of America, by and through the United States Attorney for the Western District of Texas, and pursuant to 18 U.S.C. § 3142(e) and (f), files this, its Motion to Detain Defendant Without Bond and Motion for Continuance, and for cause, would respectfully show unto the Court the following:

- 1. The Defendant was arrested for a violation of Title 18, United States Code, Section 2252(a)(4)-*Possession of Child Pornography*.
- 2. There are no conditions or combination of conditions which will reasonably assure the safety of the community should Defendant be released on bond.
- 3. There are no conditions or combination of conditions which will reasonably assure the appearance of the Defendant at future court settings.

The Government would further move the Court for a three day continuance of the detention hearing from the date of the initial appearance.

WHEREFORE, premises considered, the Government respectfully prays the Court to hold the above-named Defendant without bail pending the final outcome of this case.

Respectfully submitted,

ROBERT PITMAN

UNITED STATES ATTORNEY

By:

ROBERT ALMONTE
Assistant U.S. Attorney
Texas Bar #24049479
700 E. San Antonio, Suite 200
El Paso, Texas 79901

(915) 534-6884